

HOLBROOK, AKEL, COLD, RAY & REICHARD, P.A.

ATTORNEYS AT LAW

ONE INDEPENDENT DRIVE, SUITE 2301

JACKSONVILLE, FLORIDA 32202-5059

EDWARD C. AKEL
KATHLEEN HOLBROOK COLD
DANIEL D. AKEL
H. LEON HOLBROOK, III
THOMAS R. RAY
BETHANY RAY REICHARD
MUSA K. FARMAND

H. LEON HOLBROOK
(904) 356-2005

TELEPHONE
(904) 356-6311

FACSIMILE
(904) 356-7330

Christal Dennis

August 23, 2018

Digitally signed by
Christal Dennis
Date: 2018.08.27
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VIA EMAIL TO: CELA@sec.gov

Federal Election Commission
Office of Complaints Examination
And Legal Administration
Attn: Christal Dennis, Paralegal
1050 First Street, NE
Washington, DC 20463

RE: MUR 7451

Dear Ms. Dennis:

This letter is to respond on behalf of our client, Ring Power Corporation, (hereinafter "Respondent") to the Complaint filed in the matter referenced above. I have previously provided by email a copy of a Statement of Designation of Counsel signed by my client, and I am enclosing an additional copy with this response letter.

With respect to the allegations of the Complaint at paragraph 3, Respondent is not in a position to affirm or deny specific allegations related to the New Republican PAC, (hereinafter "PAC") though does affirm that when the contribution was made by Respondent to the PAC (as alleged in paragraph 5 of the Complaint), the Respondent understood from PAC representatives that the contribution was legally permissible.

With respect to the facts alleged in the Complaint at paragraph 4, Respondent acknowledges that the allegations are accurate, but for clarification, the payments received by Respondent through federal contracts have been a very small percentage of Respondent's total revenues during the years referenced in the Complaint. At no time has Respondent made a contribution to any political campaign or committee for the purpose of increasing its likelihood of receiving any federal contracts.

Respondent acknowledges that the contribution to the PAC described in paragraph 5 was made by Respondent, and states further that upon learning that such contribution may have been prohibited under federal law, Respondent requested and received from the PAC a refund of that contribution on August 17, 2018. A copy of the refund check is enclosed.

Respondent makes no argument with the summary of the law as contained in paragraphs 6 through 13 of the Complaint but does affirm that its officers were unaware at the time the contribution was made to the PAC that it may have been prohibited by federal law.

The Complaint alleges at paragraph 14 that Respondent violated the law by making a contribution of \$50,000 to the PAC on a date that it had a federal contract pending in the amount of \$22,456.00. Respondent has reviewed its files and determined that the work under that federal contract was invoiced on May 1, 2018 for a total amount of \$22,452.32.

Respondent has received a refund of the contribution made to the PAC and has taken steps to ensure that no future contributions will be made to any federal political campaign or committee while Respondent continues to perform any federal contracts, so as to avoid any possible risk of any future violation of federal campaign laws.

Respondent requests that the Commission consider entering into pre-probable cause conciliation with Respondent with respect to this matter, due to the de minimis nature of the federal contract cited in the Complaint as causing the contribution to be prohibited, and the Respondent's lack of knowledge that such contribution might be prohibited by federal law.

Respectfully submitted,



KATHLEEN H. COLD

KHC/ab
Enclosures



FOR SECURITY PURPOSES, THE FACE OF THIS DOCUMENT CONTAINS A COLORED BACKGROUND AND MICROPRINTING IN THE BORDER.

New Republican PAC
224 E. 6th Ave.
Tallahassee, FL 32303

Chain Bridge Bank, NA
McLean, VA 22101

No. 2139

68-9471560

Date 8/16/2018

Pay To The Order Of Ring Power Corporation

\$ **50,000.00

Fifty Thousand and 00/100

Dollars

Ring Power Corporation
500 World Commerce Parkway
St. Augustine, FL 32092



Memo: Donor Refund

SECURITY FEATURES IMPAIRED DETACH & RETURN TO BANK

100116017444001

New Republican PAC
Ring Power Corporation

8/16/2018

2139

50,000.00

Chain Bridge - Check Donor Refund

50,000.00